

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC  
REPAIR SYSTEM PRODUCTS  
LIABILITY  
LITIGATION**

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**THIS DOCUMENT RELATES TO:**

***Rowe v. Ethicon, Inc., et al.***

**Case No. 2:16-cv-10143**

**Master File No. 2:12-MD-02327  
MDL No. 2327**

**JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE**

**PLEASE TAKE NOTICE**, that Napoli Shkolnik PLLC, by and through the undersigned, respectfully moves this Court, for the reasons below, for entry of a motion to withdraw as counsel in regards to the above referenced matter.

Plaintiff Alberta Rowe was first advised via letter dated December 24, 2018 of the Court's Pretrial Order No. 323 and its requirement to appear in person before this Court. A follow-up email was subsequently sent to Plaintiff Rowe on December 26, 2018. When no response was forthcoming, counsel again reached out telephonically on January 10, 2019. Counsel spoke with Ms. Rowe for a few minutes, and was advised that she has obtained other representation. Counsel advised that obtaining new representation likely would not relieve her of her obligations under PTO No. 323, and forwarded Plaintiff Rowe another copy of PTO No. 323 via electronic mail. Ms. Rowe advised that her new attorney would contact the undersigned. That never occurred. Counsel followed up on January 20, 2019 and January 24, 2019, but no response from Ms. Rowe or her new attorney ever occurred.

Though counsel advised Ms. Rowe that the Court's Pretrial Order #323 required her attended in person, and she has advised that she will not be attending. Napoli Shkolnik, having no other plaintiff subject to PTO No. 323, would also request that it not be required to attend the February 15, 2019 settlement conference.

In light of the above, Napoli Shkolnik PLLC would respectfully request that this court grant this request to withdraw its representation of Alberta Rowe, and that this Court further relieve Napoli Shkolnik of its requirement to attended the Mandatory Settlement Conference of February 15, 2019. Counsel respectfully requests that the Court enter an Order in MDL No. 2187, as well as the above-referenced individual case number.

Dated: February 13, 2019

**NAPOLI SHKOLNIK, PLLC**

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